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February 23, 2023

By ECF and E-Mail

The Honorable William F. Kuntz, II
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Gorgi Naumovski, No. 20 Cr. 384 (WFK)

Dear Judge Kuntz:

Further to an exchange of emails earlier today with Your Honor's Case Manager Ms. Stephanie Yu, and with the consent of the government, I respectfully submit this letter to request a brief continuance of the next status conference in this matter.

The next status conference was originally scheduled for tomorrow, February 24, 2023 at 12:30 p.m. Earlier today, the parties received an order from the Court pursuant to which the status conference was adjourned to Monday, February 27, 2023 at 12:30 p.m. Due to scheduling issues that the February 27, 2023 date presents, and based on discussions with Mr. Estes about alternative dates on which the parties are mutually available, I respectfully request that the Court briefly adjourn the status conference until either March 9, 2023 (at any time that is convenient for the Court), or alternatively, until March 10, 2023 (at 4:30 pm or thereafter). If neither of these dates and times are available for the Court, the parties will gladly work to propose others.

Further, given that this matter has been designated a complex case under the Speedy Trial Act, and in light of the proposed motion schedule that the parties have already presented to the Court, Mr. Naumovski consents to the exclusion from Speedy Trial calculations of the period between February 24, 2023 and any rescheduled date for the next status conference in the matter.

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On behalf of the parties, I thank the Court for its consideration of this request.

Respectfully,

A handwritten signature in blue ink, appearing to read 'R M Radick', with a stylized flourish at the end.

Robert M. Radick

cc: Andrew Estes, U.S. Department of Justice (by ECF and email)
Maksim Nemtsev, Esq. (by ECF and email)